

Martin O'Malley Governor Anthony G. Brown Lt. Governor Richard Eberhart Hall Secretary Matthew J. Power Deputy Secretary

July 13, 2009

Mr. Eric Soter, Director Frederick County Division of Planning 12 East Church Street Frederick, MD 217001

Re:

Frederick County Comprehensive Plan and Water Resources Element

Dear Mr. Soter:

Thank you for submitting the draft Frederick County Comprehensive Plan and Water Resources Element to the Maryland Department of Planning (MDP) for our review.

Overall the Plan and Element are solidly written and will provide Frederick's citizens an excellent guide for its future growth and development.

Again, thank you for the opportunity to review and comment on this Plan. Please do not hesitate to contact me or Jenny King at 410.767.4500 should you have any questions.

Sincerely

Peter G. Conrad, AICP

Director of Local Government Assistance

Enclosure: Comments on the Draft Pathways to Carroll's Future Landscape

cc:

Jason Dubow, Planner, WRE Coordinator

Jenny King, Regional Planner

Rich Josephson, Director, Planning Services

Rita Elliott, MDP Clearinghouse

File



Maryland Department of Planning Comments on the Draft 2009 Frederick County Comprehensive Plan & Water Resources Element

02 Planning Framework and Background

Page 02-4 notes that "most" of the County's municipalities continue to provide a logical location for growth. Consideration should be given to explaining the use of "most" rather than "all". This could be connected to MG-G-02 (page 10-2) which sets a goal of developing consensus with municipalities about new residential growth.

Page 02-6: The name of BRAC is Base Realignment and Closure not Consolidation.

Page 02-7: Figure 02-1: These charts appear to come only partly from RND 7.0. The MDP's data for RND 7.0 has a jobs/housing ratio of 1.37 in 2000, not 1.53 as is in the chart. The ratios for 2005 to 2020 match RND 7.0, but 2025 (1.45) and 2030 (1.36) do not match. There were additional rounds of forecasts since RND 7.0, however, Frederick County did not participate and the ratios for the more recent forecasts do in fact match what RND 7.0 has through 2030. Additionally, it is unclear about MWCOG as a source since Frederick County submits jobs and household projections to WASHCOG.

The job figures referenced in Figure 02-1 are confusing. MDP cannot match the historic data in the chart (top of page 02-7) to available data resources. However, the text on page 02-6(fourth bullet) indicates source would be QCEW (ES-202), since the sector detail sited matches what is available from this source. Further it is not clear what end year the percent change from 2003 is being measured.

The Employment by Sector chart on the bottom of Page 02-7 is actually a chart of "employed persons" by place of residence and not jobs by place of work. Consideration should be given as to the significance this data has in a discussion of jobs by place of work. To the lay reader, this may be highly confusing.

The Plan notes a 2008 population estimate of 232,706. Based on this estimate, the 2010 population projection of 243,220 may not be achievable (see Page 02-8, Figure 02-3- increase of 10,514 people from 2008). Such an increase over the 2-year period seems very aggressive considering the County's population has increased on average 4,240 people per year. MDP recommends a more thorough explanation of how such growth will occur between 2008 and 2010.

03 Conserving Our Natural Resources and Green Infrastructure

Page 03-12: The Sensitive Areas Element section, first bullet, should state: Streams, WETLANDS and their Buffers to be consistent with HB1141.

Page 03-13 and Map 03-3 do not include information on Tier II waters. Please visit MDE's website at: http://www.mde.state.md.us/assets/document/hb1141/frederick/Frederick County.pdf for mapping information.

05 Preserving Our Agricultural and Rural Community

The goals and policies are good; especially the goal of placing 100,000 acres under preservation easement, the policies of prohibiting the expansion of Rural Residential areas into surrounding lands designated Agricultural/Rural and the expansion of community growth areas into Priority Preservation Areas (PPAs). The County's PPA has five discrete parts. The goal is to preserve 66,302 of the 82,877 undeveloped acres in the 94,391-acre PPA. Since 25,061 acres are already preserved, there are 41,241 acres remaining to place under easement in order to reach protection of 80% of the PPA.

The idea of preserving another 100,000 acres of the agricultural land base beyond the 100,000 placed under easement is also good, though the Plan should say more about how this will be accomplished.

This section acts as a one-stop source of information about things agricultural in the County, including a description of the various aspects of the farmland preservation effort, which is a good service for the Plan to provide the reader. The description of the agricultural zoning is good. The last paragraph in particular stands out:

Since 2002 the number of residential lots created in the Agricultural zone has been increasing, with an average of 150 lots/year having been subdivided, over the period of 1995 to 2001, when the average was 84 lots/year. When combined with the number of farm lots created since 1995, a total of 1,804 lots encompassing 22,500 acres have effectively been taken out of agricultural use.

This is a very high rate of land conversion for a County that wishes to remain viable for agriculture. Most of the acreage has been lost to farm lots, many of which are actually residential. The County should make sure that the proposed actions will lead to a reduction in the rate of agricultural land conversion.

The Priority Preservation Area (PPA) and the PPA plan element were required for recertification of the County's farmland preservation program by MDP and MALPF. MDP and MALPF's review found that they met the new requirements resulting from HB 2. The County's program was conditionally recertified through June 30, 2010. The recertification was conditional because the comprehensive plan, with the PPA plan element, would not be approved until later in the year. After the PPA and PPA plan element are approved (assuming they are the same as in the draft), MDP and MALPF will certify the County through June 30, 2012.

Consideration should be given to add to the policies on page 05-2 that community water and sewerage will not be extended into agricultural lands. Addition of such a policy would strengthen the Plan by suggesting ways to ensure consistency between the County Comprehensive Plan and the County 10-Year Water and Sewerage Plan.

06 Providing Transportation Choices

Page 06-2: It is suggested that the Plan include a rural area highway policy that calls for limiting highway improvements to only safety projects in rural, agricultural, or natural resource areas. Limiting roadway projects in rural/agricultural/natural resource areas to only safety and substandard highway improvements will help the County to better utilize limited transportation funding sources so as to support the County's policies of directing growth to community growth areas and preventing further expansion of rural residential development into rural and agriculturally zoned areas.

Page 06-29: TR-A-03 calls for developing a county roads needs inventory and prioritizing roadway improvements. The Plan assembles a list of roadway improvement projects from the regional plans on pages 06-10 to 06-13. Many of the proposed new/relocated roadway improvements are outside of the County's community growth areas. While it is important to identify and prioritize highway improvements to meet existing and future travel demand, the County should consider unintended land use and growth effects of highway improvements in agricultural/rural, priority preservation, and natural resource areas. We recommend the County only consider safety or substandard correction projects outside the community growth areas.

If a proposed major state highway improvement is outside Priority Funding Areas (PFA), the project is not eligible for state transportation funding unless the project could meet an exception defined by the 1997 Priority Funding Area law. Any major state transportation project will be evaluated for compliance with the 1997 Priority Funding Area law and consistency with the State's 1992 Economic Growth, Resource Projection, and Planning Policy.

MDP appreciates the County's effort in working with the State to resolve the PFA issue of the I-70/Meadow Road Improvement Project. As indicated in MDP's June 10, 2009 letter to Commissioner Jan Gardner, MDP would be agreeable to consider the Project Area within the PFA if the County could amend its Water and Sewerage Plan to include certain portions of the Project Area within the 10-year service classification so that the Project will be eligible for future State funding.

MDP notes that the Plan addresses policies and actions to enhance the planning coordination between the County and municipalities. It appears that a better coordination with the Town of New Market to address traffic effects of planned developments is particularly important in the New Market Region. MDP understands that the I-70/Meadow Road Project Improvement will support the planned Linganore Town Center Development as well as help to relieve some traffic impacts in the Town of New Market. However, if the I-70/Meadow Road Project combines with a substantial upgrade improvement on Ijamsville Road south of I-70, it is likely these highway improvements could bring growth pressure to the area south of I-70. The Plan designates Ijamsville Road as a Minor Arterial; and the 2008 New Market Region Plan indicates that the County's CIP includes updates to Ijamsville Road. It is unclear what type of improvement the County is implementing on Ijamsville Road.

Page 06-10: MDP notes that the proposed new interchange with I-70 and a large portion of the new Minor Arterial extending from the proposed Middletown Bypass are within the County's Wellhead Protection Zone, outside the Middletown Community Growth Area and outside the PFA. As noted above, any project that is outside PFA will not be eligible for State funding unless the project could meet an exception defined by the 1997 PFA law. The intent of the 1997 PFA law is to support growth within PFAs by investing major State transportation projects in PFAs and to discourage sprawl outside PFAs. The County should address land use/growth management strategies that prevent low density rural residential developments that might be facilitated by the new Minor Arterial and the new interchange with I-70. Perhaps, a future community plan could address the potential land use/growth management policies and strategies that will help to minimize sprawl effects. These land use policies and strategies will help the State to evaluate the smart growth merit of the proposed bypass. The same approach should also be applied to any proposed State highway projects that are located outside PFAs, such as the Proposed Libertytown Bypass.

Page 06-13, Map 06-2: The County should consider including the community growth area overlays on this highway plan map.

Page 06-3, TR-P-16: The County may consider including the Maryland Department of Planning as one of coordinating agencies. MDP will be glad to coordinate with the County on State projects that have smart growth and land use issues.

Page 06-12: It is good that the County calls for developing highway corridor plans. Under "Action Items" on page 06-29, an action item should be developed to elaborate how the County will implement its corridor planning effort and identify potential corridors for studies. If it is for state highway corridors, the State including MDP will be glad to assist in the corridor plan development.

Page 06-30: MDP compliments the inclusion of TR-A-22 that calls for amending the APFO to allow for developers to be given credit for the provision of bicycle, pedestrian and transit improvements and other TDM implementations. This is a good strategy that will help the County to start building walkable, bicycle friendly, and transit accessible communities while reducing the need for widening intersections and roadways as the only transportation solution for supporting growth.

Page 06-31: The Plan should include an action item addressing the need for planning compatible land uses around the Frederick Municipal Airport.

07 Serving Our Citizens

The Community Facilities Element Section, page 07-7, provides an overview of the local educational agency's public school facilities. The Plan includes a county-wide map displaying existing and planned schools as well as several tables that display the (1) number of schools and facilities by primary grade level; (2) county-wide school utilization by grade level; (3) projected enrollments; and (4) the number of facilities that are currently planned to accommodate future population growth.

Consideration should be given to expand the discussion of the County's renovation/modernization needs. The Plan in its present form vaguely mentions this facet of educational facility planning. The Plan seems to focus more on construction of new schools. It is recommended that the School Policy Section located on page 07-02, be expanded to include specific language encouraging the rehabilitation of existing schools in established neighborhoods to ensure that these facilities are not overburdened and inadequate.

Page 07-5: Facility Siting Principles: The Plan should include text that discusses the intention of the Plan for rural and agricultural land. Provisions for health and safety concerns should be discussed.

Page 07-9: The planned facilities sites list should be connected to planned growth areas and ultimately a PFA where public facilities exist.

Page 07-17: The Plan notes a July 2008 population of 170, 925 minus the City of Frederick. However, if the population of 170,925 and 61,960 (Frederick) is added the population total is 232,885 which do not correspond to the overall population figure on page 02-8 of 232,706.

Page 07-21, SC-A-01: Consideration should be given to bank school sites in areas that can access public facilities and be within community growth areas.

The Plan states on page 07-23: "The purpose of the Master Water and sewerage Plan is to provide an overview of the planning policies, needs, and planned infrastructure related to community and individual water and sewerage systems." This description of purpose should include the point that the County Water and Sewer Plan must support and be consistent with the County Comprehensive Plan. The binding relationship between the County Water and Sewerage Plan and the County Comprehensive Plan is stated in Title 26 Department of the Environment Subtitle 03 Chapter 01 Planning Water Supply and Sewerage Systems: Objective of County Plan. It states that the

objective of the county water and sewer plan is to develop the water supply and sewerage systems in a way consistent with county comprehensive planning. The plan shall be used as a tool to implement the county development policy so that: an ample supply of water can be collected, treated, and delivered to points of use;..."

The Plan should take every opportunity to provide guidance, recommendations and policies to the 10-Year Water and Sewerage Plan so that the kinds of facilities needed and the placement of such facilities are clearly connected to the intentions of the Comprehensive Plan. If the consistency of the two plans cannot be established it is possible that funding for water and sewerage projects may not be extended and amendments to the Water and Sewerage plan may not be approved.

Page 07-25: Water and Sewerage Plan Revisions: "The adoption of the Comprehensive Plan with adjustments to community growth areas boundaries and land use plan designations will be reflected in amendments to the Water and Sewerage Plan, which will be effective with the adoption of the Comprehensive Plan." This sentence seems to imply that adjustments to growth area boundaries and land use designations in the Comprehensive Plan will be reflected in amendments to the Water and Sewerage Plan and that the amendments will be effective with the adoption of the Comprehensive Plan.

We recommend that this text be revised to reflect the procedures required by State law and regulations for amending the County Water and Sewerage Plan. Amendments to the Water and Sewerage Plan require a number of steps including a review of the amendments in draft by related jurisdictions and planning agencies, a public hearing, review of amendments by certain State agencies and approval by the Maryland Department of the Environment. If these actions are not taken in the prescribed sequence they will not be able to be included in the County Water and Sewerage Plan.

Page 07-31: The Plan notes an average population increase per year of 4,500 people. However, page 02-8 notes an average increase of 4,240 people per year.

08 Supporting a Diversified Economy

Page 08-6: Map 08-1 should include freight rail lines which will show how planned industrial uses are related to freight rails in the County. It is good that the Plan includes policies that encourage allocating freight-related industrial land uses to utilize rails, but it is not clear if the availability of existing commercial/industrial land uses have adequately addressed the need for industrial land uses along the freight rails.

Water Resources Element

Comments that must be incorporated in order to meet the statutory requirements of HB1141 are in **bold**. Please note that these review comments are on the Water Resources Element that was submitted separately from the Comprehensive Plan.

Overall comments:

• SB276, passed in the 2009 Maryland legislative session, sets a statewide land use goal of increasing the current percentage of growth in Priority Funding Areas (PFAs) and decreasing the current percentage of growth outside of PFAs. SB276 also requires local governments to develop a percentage goal towards achieving the statewide goal. Although the new annual report requirements (including the local land use goal) under SB276 will not be filed until July 1, 2011, Frederick County should consider whether its estimates of the percentage of growth to be served by public water and sewer – 61% (p. 6) – will be sufficient to achieve

the statewide land use goal. Statewide in Maryland, the current percentage of growth in PFAs (not including "comment areas") is 68% - http://www.mdp.state.md.us/msdc/PFA/Resid Growth/by County/PFA cnty index.htm.

- If possible, the County and municipalities should reach agreement on expected water and sewer demand and expected land use change, taking into consideration the municipalities' Municipal Growth Element (MGE). This will provide assurance that sufficient capacity will exist to meet the needs of all. Clarify whether this agreement has been reached or not in the WRE.
- The County should review its Land Preservation, Parks, and Recreation Plan and identify
 measures that will implement the Water Resources Element strategies. Referral of these
 relevant sections within the Land Preservation, Parks and Recreation Plan should be cited
 within the Water Resources Element.
- The 2030 population projection figure in the WRE (pg. 6) is inconsistent with the population projections in the County's Water & Sewerage plan. Please address this discrepancy.
- Section 11 of the Comprehensive Plan, "Community and Corridor Plans," discusses growth in each of the nine planning regions and their Community Growth Areas (CGAs). The population projections provided are for build out of the planning regions and are not calculated through the year 2030. For planning purposes, population projections through 2030 (at 5 year increments) are more useful than build out since build out is for an indeterminate time period. By breaking growth down into 5-year increments, it will also be easier to determine when capacities will be met. Within the WRE, for those water and sewer systems (at least for County systems) where a deficit is identified at build-out (Tables 6 and 8), the County should include a separate table that indicates when the deficit will likely occur and/or indicate capital improvement plans that will resolve the deficit.
- It would be helpful if the WRE referenced Section 11 of the Plan and stated that the
 demand figures discussed in the WRE were taken from the projections from the planning
 regions in Section 11. The projections from the planning regions section should inform the
 WRE and the figures should match up.

To ensure the adequacy of water supplies to support existing and future development as proposed in the land use plan, the Frederick County Comprehensive Plan includes a discussion of future demand and compares this to current capacity (p. 19). In addition, the Plan discusses methods of protecting the County's source water (pp. 14-15, 32).

Comments on the water demand analysis include:

• It is unclear whether Tables 5 and 6 (pgs. 18-19) include both residential and non-residential water demand figures. Please indicate whether both demand figures are included in either the title of the tables or in the text of the WRE. If the tables do not include both residential and non-residential figures, please add the missing figures to the tables, at least for the County systems.

- Table 5 indicates that the current demand for drinking water exceeds the current permitted capacity for the Copperfield (Jefferson) water system (pg. 18). This deficiency should be discussed in more detail on page 21 under the Jefferson Service Area section. All that is stated on page 21 is that the County's long-term plan is to combine the ground water systems in Jefferson into a single community water system and that additional wells and storage are needed. It would be helpful to also discuss this deficiency in the drinking water action items section (pg. 32). However, if this is not a pressing issue, please specify that as well.
- It would be helpful if Table 6 included a column that calculated the deficit in available capacity if all potential dwelling units (both pipeline dwellings and undeveloped potential dwelling units) are built (pg. 19). Another option would be to highlight in the table those systems where a deficit is expected.
- The Plan could discuss the feasibility of the City of Brunswick's Plan to obtain additional appropriation permits from MDE and its plan to finance expansions of their water treatment facility in order to keep up with demand and population growth (pg. 24).
- Check to ensure Table 5 includes the same capacity and demand figures as listed in the text describing the water systems. The Fountaindale/Braddock Heights Service Area text (p. 21) includes different capacity and demand figures than in Table 5.

The Frederick County Comprehensive Plan identifies the water bodies affected by land use impacts (pg. 7). The Plan does not yet discuss whether the water bodies are suitable receiving waters for expected land use impacts, and does not yet include a point source pollution forecast. Although the WRE discusses the suitability of receiving waters with regard to WWIP discharge (pp. 33, 55), this discussion should be expanded to include the suitability of receiving waters with regard to both forecasted WWIP discharge and nonpoint source pollution impacts (septic tanks and stormwater runoff) combined based on the proposed land use plan.

Comments on the sewer demand analysis:

- The County should be commended for identifying the need to address failing septic systems.
- Clarify whether the demand figures in Table 7 include demand caused by inflow and infiltration (pg. 35).
- It is unclear whether Tables 7 and 8 include both residential and non-residential sewer demand figures (pgs. 35-36). Please indicate whether both demand figures are included in either the title of the tables or in the text of the WRE. If the tables do not include both residential and non-residential figures, please add the missing figures to the tables, at least for the County systems.
- It would be helpful if Table 8 added a column that calculated the deficit in available sewer capacity if all potential dwelling units (both pipeline and undeveloped potential dwelling units) are built (pg. 36). Another option would be to highlight in the table those systems where a deficit is expected.
- The Plan states that several septic tanks (both residential and commercial) will be connected to the City of Brunswick's WWTP (pg. 40) and to the new Fountaindale WWTP (once it comes online for the Braddock Heights community) (pg. 42). The Plan should discuss how

- this would impact available WWTP capacity and the exact amount of capacity needed to connect existing septic tanks.
- One of the Wastewater Policies, WR-P-14 (pg. 46), states "Recognize and support the use of new septic system technologies and the use of alternatives to septic systems." The County could consider the ways that this policy may encourage development in rural and agricultural areas and whether this policy encourages growth in areas that otherwise would not sustain growth. The County could also ask whether this policy supports the goal of directing growth into planned growth areas and whether technology could be used to support compact development patters such as clustering.

Comments on the proposed methods for protecting the County's source water:

• The Plan identifies common water quality concerns and states that the County adopted a 2007 Wellhead Protection Ordinance that established wellhead protection areas for all community groundwater supply systems, amended section of the county code to include new regulations for hazardous substance storage tanks, and prohibited certain land uses and activities within designated wellhead protection areas. In addition, several municipalities have adopted their own wellhead protection ordinances (pg. 15).

Comments on identifying suitable receiving waters:

- The "Nonpoint Source Loading Analysis" evaluates the pollution impacts from the County's current land use plans, based on the eight region plans adopted between 1997 and 2008 (pp. 47-48). The WRE states that this analysis will provide a baseline for evaluating changes to the proposed land use plan in the 2009 draft Frederick County Comprehensive Plan. To fulfill the requirements of HB1141, the WRE also needs to include a nonpoint pollution forecast based on the proposed land use plan.
- Also, the "Nonpoint Source Loading Analysis" should be informed by the municipalities' Municipal Growth Element (MGE). In the absence of completed MGEs, assumptions can be made regarding future municipal growth. The purpose of including the municipal land uses and growth areas in the pollution forecast is to understand the collective impact of land use change on receiving waters. This can serve as a point of departure for discussions with municipalities when developing restoration plans (or TMDL implementation plans) for particular water bodies (which could include revisions to local land use plans). Clarify how the County's pollution forecast is informed by the municipalities' MGEs.
- The Plan states that the county's WWTPs discharge to main stem sections of the Monocacy River, Catoctin Creek and the Potomac River as well as their tributaries; however, the plan does not yet discuss whether these are suitable receiving waters for expected land use impacts combined with expected wastewater discharge based on the proposed land use plan.
- The Plan does not yet include a future point source pollution forecast. This information should be added to the Plan. Once completed, the Plan should also present the sum of the point source pollution and nonpoint source pollution forecasts in order to guide the county's discussion on suitability of receiving waters. In addition, the forecast of future point source pollution should be compared against the TMDL point source allocation caps and/or Tributary Strategy point source caps

in a separate table to show whether the point source caps might act as a constraint to WWTP discharge.

- The County should be commended for including an impervious surface analysis (pg. 48).
- The County should be commended for including septic system loads for residential and non-residential development as part of the nutrient pollution analysis. If only 22,631 of the estimated additional 37,100 dwellings by 2030 will be served by public water/sewer (p. 6), then that means there will be 14,469 additional septic tanks by 2030, or about 700 additional septic tanks each year. The pollution impact of additional septic tanks is noted in the WRE (pp. 6, 45). Given the results of the County's pollution forecast (p. 50), the County might want to include land use plan recommendations that would limit additional septic tanks.
- The WRE should evaluate the pollution forecasts from one or more land use plan options. The WRE should include a statement that the other options were considered and that the land use plan included in the comprehensive plan is the "least impactful" plan option. Calculations to back-up this statement should be included and referenced.

Other water resource planning comments:

 Please refer to the review criteria (pp. 27, 32-33, 39-40) in the Water Resource Element Models & Guidelines document for further guidance http://www.mdp.state.md.us/mgs/pdf/mg26.pdf.

Wastewater Policy: WR-P-14: "Recognize and support the use of new septic system technologies and the use of alternatives to septic systems." We recommend that the County consider the ways that this policy may encourage development in rural and agricultural areas. Will this policy encourage growth in areas that otherwise would not sustain growth? Does this policy support the goal of directing growth into planned growth areas? Should such technology be used to support compact development patterns such as clustering?

Page 09-4 of the Comprehensive Plan (09 Assessing Our Water Resources) states a County population projection of 331,700 by 2030. However, page 02-8 states a 2030 population of 326,224. The discrepancy is small but should be fixed for consistency.

10 Managing Our Growth

Page 10-2, MG-G-02: Consideration should be given to connect this goal to the discussion about municipalities on page 02-4. Further, this goal could be expanded to also address commercial and industrial growth.

Page 10-9: Consideration should be given to expand the discussion of the County's municipal growth areas rather than only listing the municipalities that have to have municipal growth elements per HB1141.

Page 10-35: Graphic is cut off.

11 Community and Corridor Plans

There are opportunities to ensure consistency between the County Comprehensive Plan and the County 10-Year Water and Sewerage Plan. We note the following:

Page 11-3: The Plan states: "Described here are the Land Use Plan designations that are illustrated on the Land Use Plan Map with references to the intent of these designations, their relative land use intensity or density, their general placement guidelines, and the zoning districts that would be applied to each designation in order implement the County's land use policies." It is recommended that this sentence include water and sewerage service areas. For example: "Described here are the Land Use Plan designations that are illustrated on the Land Use Plan Map with references to the intent of these designations, their relative land use intensity or density, their general placement guidelines, their water and sewerage service areas and the zoning districts that would be applied to each designation in order implement the County's land use policies." The text includes information concerning the current status of water and sewer in each regional. It is reasonable that a reference be included in this preview.

It is recommend that each land use designation include guidance concerning what kind of facility is allowed in each land use designation and what conditions if any may be attached to attached to their use. We note that such guidance is provided for some categories and not others.

Maps indicating the proposed service areas should be included in the Comprehensive Plan. This will allow the reader to see the relationship between any proposed staging of development and the staging of water and sewer facilities.

Land Use Policies and Transportation Planning

Pages 11-3 to 11-7 (Land Use Designations) and the Comprehensive Land Use Map: Except for the area near the Monocacy Transit Station where mixed use development is planned, the area near the Proposed Urbana Transit Station Area appears to be outside the planned Village Center; and the Proposed Transit Station Area near Firetower Road and Mott Road is designated as Office/Research/Industrial with limited potential for mixed uses. Although the proposed I-270 Transitway is a long term project, there will be no harm to encourage mixed and compact TOD developments in these potential transit station areas. It is also possible that these areas could be served by potential express commuter buses prior to building the Transitway. We encourage the County to implement TR-A-17 on page 06-30 which calls for establishing TOD overlay zones around existing and future transit centers. A form-based code is a good tool to help to implement TOD and mixed use development. The County should consider a form-based code for the TOD overlay zones and mixed use development.

Page 11-97 and Page 10-4: The County is encouraged to apply the Transit Friendly Design Guidelines to the planned commercial/employment development along the I-270 corridor and in other areas. On page 10-4, the Plan should include a policy that calls for transit friendly commercial and employment development. Without specific policies and guidelines, too often, commercial/employment land uses would be developed as suburban and campus types of employment/commercial centers where transit can't be served effectively. The County may also modify TR-A-16 on page 06-30 to specify the types of land uses including commercial/employment that the County intends to apply the Transit Friendly Design Guidelines.

General Comments Related to Chapter 11

It would be helpful if the projected population figures on the first page of each Planning Region Profile were extrapolated to the year 2030. MDP recommends comprehensive planning documents examine potential growth to at least 20 years out.

Please consider adding legends to the community growth area break out maps.

Consideration should be given to expand the municipal growth area plan component for municipalities. The text now simply lists the municipal name and just has "Municipal Growth Area". Since the County has met with its municipalities during the process of the Plan development it may be appropriate to discuss those municipal growth areas/elements to some degree within the sections that include the municipal comprehensive plans. We note that some of the community growth areas mention the municipal plan development.

The Department appreciates the Community Land Use Plan tables which breakdown land uses and by acreage, undeveloped acreage, pipeline dwellings and potential dwellings. The inclusion of population figures into the tables may help strengthen the link between land supply and demand.